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7 UNITED STATES DISTRICT COURT
8 DISTRICT OF NEVADA

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9 UNITED STATES OF AMERICA,)
10)
Plaintiff,)
11)
vs.)
12)
ANDREW HANZELIC,)
13)
Defendant.)
14)

Case No: 2:15-cr-127-RFB

**EMERGENCY STIPULATION TO
MODIFY CONDITIONS OF RELEASE
(EXPEDITED TREATMENT
REQUESTED)**

15 IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A. Trutanich,
16 United States Attorney, and Sarah Kiewlicz, Trial Attorney, Department of Justice, counsel for the
17 United States of America, and Rene L. Valladares, Federal Public Defender, and Brian Pugh,
18 Assistant Federal Public Defender, counsel for Andrew Hanzelic, that Mr. Hanzelic's pretrial
19 release travel condition be amended to allow Mr. Hanzelic to travel to the State of Washington.

20 This stipulation is entered into for the following reasons:

- 21 1. Mr. Hanzelic's father-in-law was recently diagnosed with stage four cancer.
22 2. Mr. Hanzelic requests that he permitted to travel with his wife to Washington to
23 visit his father-in-law. Mr. Hanzelic and his wife have saved money and made arrangements to
24 travel to Washington to visit his father-in-law.

1 3. Mr. Hanzelic has been on pretrial supervision for three and a half years and has
2 performed well. He has had no violations.

3 4. Mr. Hanzelic's pretrial services officer has no objection to modifying
4 Mr. Hanzelic's conditions of release to permit travel to the State of Washington.

5 5. The parties agree to this modification.

6 Dated this 12th day of December 2019.

7 RENE L. VALLADARES
8 Federal Public Defender

NICHOLAS A. TRUTANICH
United States Attorney

9 By /s/ Brian Pugh
10 BRIAN PUGH
11 Assistant Federal Public Defender
12 Counsel for Defendant

By /s/ Sarah Kiewlicz
SARAH KIEWLICZ
Department of Justice Tax Division

12 ORDER

13 IT IS SO ORDERED.

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16 RICHARD F. BOULWARE, II
17 United States District Judge

18 DATED: December 12, 2019
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